

REMARKS

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. This amendment is believed to be fully responsive to all issues raised in the Office Action mailed
5 October 3, 2005.

Rejections Under 35 U.S.C. §102

Claims 1-8

Claims 1-18 were rejected under 35 U.S.C. §102(e) as being anticipated
10 by U.S. Patent No. 6,538,669 to Lagueux, et al. (hereinafter, "the '669 patent"). Applicants traverse this rejection.

The '669 patent cannot anticipate (or render obvious) independent claim 1 because the '669 patent neither discloses (nor even suggests) limitations explicitly recited in independent claim 1. Claim 1 recites "a virtualized logical
15 disk object representing a virtual storage container, wherein the virtualized logical disk is an abstract representation of physical storage capacity provided by plurality of physical stores." The Action appears to assert that the LUN described in the '669 patent discloses this limitation, and cites column 7, column 8, lines 25-35, and column 17 to support the assertion.

20 Claim 1 further recites as a separate element "a virtual disk object representing a virtual storage container, wherein the virtual disk object is an abstract representation of one or more virtualized logical disk objects, the virtual disk object including an exposed management interface." The Action asserts